

Harvis & Fett

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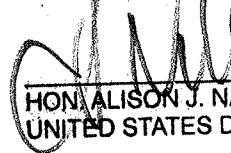
GABRIEL P. HARVIS
BAREE N. FETT

August 18, 2017

BY ECF

Honorable Alison J. Nathan
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

SO ORDERED:


HON. ALISON J. NATHAN
UNITED STATES DISTRICT JUDGE

8/23/17

Re: *Lisa Snead v. City of New York, et al.*, 16 CV 9528 (AJN)

Your Honor:

I represent plaintiff Lisa Snead in the above-referenced civil rights action. I write to respectfully request, on behalf of the parties, an extension of the fact discovery deadline from September 7, 2017 until September 29, 2017.

SO
ORDERED

By way of brief background, this § 1983 case challenges the August 13, 2015 arrest of plaintiff Lisa Snead, a 51-year-old New York City bus driver with no criminal history.

The current September 7th fact discovery deadline was set in the Civil Case Management Plan and Scheduling Order endorsed by the Court on May 16, 2017. *See* DE #26. The parties thereafter exchanged discovery demands and served their respective responses on June 28, 2017. By e-mail on July 14, 2017, plaintiff outlined to defendants nineteen categories of outstanding paper discovery. Defendants agreed to provide a written response and the parties scheduled party depositions to take place next week, beginning on August 21, 2017.

As of yesterday, plaintiff had received neither a response to his July 14th e-mail nor any of the outstanding documents set forth therein. Plaintiff brought the issue to the attention of defense counsel by e-mail yesterday, and the parties met and conferred earlier today. Defendants represented that most of the documents would be produced by August 25, 2017, and raised certain purported deficiencies regarding plaintiff's June 28th responses. It was agreed, for the sake of economy, that plaintiff would wait to see what defendants produce on August 25th and the parties would further confer on the issues raised by

Hon. Alison J. Nathan

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defendants before presenting a discovery motion to the Court, if necessary. If it should please the Court, the parties respectfully request a brief adjournment to allow the meet and confer process to run its course, for the adjudication of any discovery motions and for party depositions.

No previous request to extend the fact discovery deadline has been submitted and the proposed extension will not affect any other scheduled deadlines. Accordingly, the parties respectfully request an extension of the fact discovery deadline from September 7, 2017 until September 29, 2017.

Thank you for your consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'G. Harvis', written over a horizontal line.

Gabriel P. Harvis

cc: Nana Sarpong, Esq.